

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

**05 CR 10085 RCL**

UNITED STATES OF AMERICA

v.

HANA F. AL JADER

)  
) CRIMINAL NO.  
) VIOLATIONS:  
) 18 U.S.C.1589: Forced  
) Labor;  
) 18 U.S.C. 1594: Attempted  
) Forced labor;  
) 18 U.S.C. 1592:  
) Document Servitude;  
) 18 U.S.C. 1519:  
) False Records;  
) 18 U.S.C. 1546:  
) Visa Fraud;  
) 8 U.S.C. 1324(a)(1)(A):  
) Harboring Alien  
) Unlawfully In United  
) States;  
) 18 U.S.C. 1594;982(a)(6):  
) Forfeiture Of Real  
) Property Used In Offense

INDICTMENT

The Grand Jury charges that:

GENERAL ALLEGATIONS:

1. At all times relevant to this indictment, the defendant, HANA F. AL JADER, was a citizen of Saudi Arabia residing in houses located in Arlington and Winchester, Massachusetts.

2. At all times relevant to this indictment, two women from Indonesia, hereinafter referred to as "Tri" and "Ro" worked as domestic servants for the defendant, HANA F. AL JADER, and her family.

**COUNT ONE: 18 U.S.C. §§1589 and 1594 - Forced Labor and Attempted  
Forced Labor**

The Grand Jury further charges that:

3. The General Allegations are realleged and incorporated herein.

4. Commencing in or around February, 2003 and continuing to on or about November 16, 2004, in Arlington and Winchester, and elsewhere within the District of Massachusetts, the defendant

**HANA F. AL JADER**

knowingly obtained, and attempted to obtain, the labor and services of Tri by threats of serious harm to, and physical restraint against Tri; by a scheme, plan, and pattern intended to cause Tri to believe that, if she did not perform such labor or services, that she would suffer serious harm or physical restraint; and by the abuse and threatened abuse of law and the legal process.

All in violation of Title 18, United States Code, Sections 1589 and 1594.

**COUNT TWO: 18 U.S.C. §§1589 and 1594 - Forced Labor and Attempted  
Forced Labor**

The Grand Jury further charges that:

5. The General Allegations are realleged and incorporated herein.

6. Commencing in or around February, 2003 and continuing to on or about November 16, 2004, in Arlington and Winchester, and elsewhere within the District of Massachusetts, the defendant

**HANA F. AL JADER**

knowingly obtained, and attempted to obtain, the labor and services of Ro by threats of serious harm to, and physical restraint against Ro; by a scheme, plan, and pattern intended to cause Ro to believe that, if she did not perform such labor or services, that she would suffer serious harm or physical restraint; and by the abuse and threatened abuse of law and the legal process.

All in violation of Title 18, United States Code, Sections 1589 and 1594.

**COUNT THREE: 18 U.S.C. §1592 - Document Servitude**

The Grand Jury further charges that:

7. The General Allegations are realleged and incorporated herein.

8. Commencing from a date in 2002 unknown to the grand jury, but at least from on or about February 13, 2003 through on or about November 16, 2004, in the District of Massachusetts and elsewhere, the defendant

**HANA F. AL JADER**

did knowingly conceal, remove, confiscate, and possess the actual Indonesian passport and United States visa belonging to Tri in the course of a violation of, and with the intent to violate Title 18, United States Code, Section 1589, and to prevent and restrict, without lawful authority, Tri's liberty to move and travel, in order to maintain the labor and services of Tri, a victim of severe form of trafficking in persons.

All in violation of Title 18, United States Code, Section 1592(a).

**COUNT FOUR: 18 U.S.C. §1592 - Document Servitude**

The Grand Jury further charges that:

9. The General Allegations are realleged and incorporated herein.

10. Commencing from a date in 2002 unknown to the grand jury, but at least from on or about February 13, 2003 through on or about November 16, 2004, in the District of Massachusetts and elsewhere, the defendant

**HANA F. AL JADER**

did knowingly conceal, remove, confiscate, and possess the actual Indonesian passport and United States visa belonging to Ro in the course of a violation of, and with the intent to violate Title 18, United States Code, Section 1589, and to prevent and restrict, without lawful authority, Ro's liberty to move and travel, in order to maintain the labor and services of Ro, a victim of severe form of trafficking in persons.

All in violation of Title 18, United States Code, Section 1592(a).

**COUNT FIVE: 18 U.S.C. §1519 - Falsification of Records**

The Grand Jury further charges that:

11. The General Allegations are realleged and incorporated herein.

12. On a date in 2003 unknown to the grand jury but at least prior to December 19, 2003, in the District of Massachusetts, the defendant

**HANA F. AL JADER**

knowingly falsified and caused to be falsified a document dated January 15, 2002 and purporting to be a Work Contract between H.H. Prince Mohamed Bin Turki Alsaud and Tri in support of a visa extension for Tri, with the intent to impede, obstruct and influence, and in contemplation of and in relation to a matter within the jurisdiction of the Department of Homeland Security, Bureau of Citizenship and Immigration Services.

All in violation of Title 18, United States Code, Sections 1519 and 2(b).

**COUNT SIX: 18 U.S.C. §1519 - Falsification of Records**

The Grand Jury further charges that:

13. The General Allegations are realleged and incorporated herein.

14. On a date in 2003 unknown to the grand jury but at least prior to December 19, 2003, in the District of Massachusetts, the defendant

**HANA F. AL JADER**

knowingly falsified and caused to be falsified a document dated January 15, 2002 and purporting to be a Work Contract between H.H. Prince Mohamed Bin Turki Alsaud and Ro in support of a visa extension for Ro, with the intent to impede, obstruct and influence, and in contemplation of and in relation to a matter within the jurisdiction of the Department of Homeland Security, Bureau of Citizenship and Immigration Services.

All in violation of Title 18, United States Code, Sections 1519 and 2(b).

**COUNT SEVEN: 18 U.S.C. §1546(a) - Visa Fraud**

The Grand Jury further charges that:

15. The General Allegations are realleged and incorporated herein.

16. On or about December 19, 2003, in the District of Massachusetts and elsewhere, the defendant

**HANA F. AL JADER**

did knowingly cause to be presented to the United States Department of Homeland Security, Bureau of Citizenship and Immigration Services, an application and other documents required by the immigration laws, and regulations prescribed thereunder, to wit: a document dated January 15, 2002 and purporting to be a Work Contract between H.H. Prince Mohamed Bin Turki Alsaud and Tri in support of a visa extension for Tri, which contained statements, to wit: that Tri "works. . . as a housekeeper, for eight hours daily and will get one thousand five hundred dollars a month," which the defendant HANA F. AL JADER then and there knew were false in that Tri was paid only \$300 per month and worked more than eight hours daily.

All in violation of Title 18, United States Code, Sections 1546(a) and 2(b).



**COUNT EIGHT: 18 U.S.C. §1546(a) - Visa Fraud**

The Grand Jury further charges that:

17. The General Allegations are realleged and incorporated herein.

18. On or about December 19, 2003, in the District of Massachusetts and elsewhere, the defendant

**HANA F. AL JADER**

did knowingly cause to be presented to the United States Department of Homeland Security, Bureau of Citizenship and Immigration Services, an application and other documents required by the immigration laws, and regulations prescribed thereunder, to wit: a document dated January 15, 2002 and purporting to be a Work Contract between H.H. Prince Mohamed Bin Turki Alsaud and Ro in support of a visa extension for Ro, which contained statements, to wit: that Ro "works. . . as a housekeeper, for eight hours daily and will get one thousand five hundred dollars a month," which the defendant HANA F. AL JADER then and there knew were false in that Ro was paid only \$300 per month and worked more than eight hours daily.

All in violation of Title 18, United States Code, Sections 1546(a) and 2(b).

**COUNT NINE: 8 U.S.C. §§1324(a)(1)(A)(iii) and (B)(i) - Harboring  
an Alien in the United States**

The Grand Jury further charges that:

19. The General Allegations are realleged and incorporated herein.

20. Commencing on or about January 12, 2004, and continuing to on or about November 16, 2004, within the District of Massachusetts, the defendant

**HANA F. AL JADER**

knowingly and in reckless disregard of the fact that Tri, an alien, had come to, entered and remained in the United States in violation of law, attempted to and did harbor Tri in a place, specifically, the residences at 339 Mystic Street, Arlington, Massachusetts and 62 Cambridge Street, Winchester, Massachusetts, and did so for the purpose of commercial advantage and private financial gain.

All in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(iii) and (B)(i).

**COUNT TEN: 8 U.S.C. §§ 1324(a)(1)(A)(iii) and (B)(i) - Harboring  
an Alien in the United States**

The Grand Jury further charges that:

21. The General Allegations are realleged and incorporated herein.

22. Commencing on or about January 12, 2004, and continuing to on or about November 16, 2004, within the District of Massachusetts, the defendant

**HANA F. AL JADER**

knowingly and in reckless disregard of the fact that Ro, an alien, had come to, entered and remained in the United States in violation of law, attempted to and did harbor Ro in a place, specifically, the residences at 339 Mystic Street, Arlington, Massachusetts and 62 Cambridge Street, Winchester, Massachusetts, and did so for the purpose of commercial advantage and private financial gain.

All in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(iii) and (B)(i).

**FIRST FORFEITURE ALLEGATION: 18 U.S.C. 1594(b) -- Criminal Forfeiture**

The Grand Jury further alleges that:

As a result of committing one or more of the offenses alleged in Counts One and Two of this Indictment, charging forced labor and attempted forced labor, in violation of 18 U.S.C. §1589 and 1594,

**HANA F. AL JADER**

defendant herein, upon conviction, shall forfeit to the United States, pursuant to 18 U.S.C. §1594(b), any interest in any property, real or personal, that was used or intended to be used to commit or to facilitate the commission of the charged offenses.

1. Such property includes, but is not limited to, the following:

(a) The real property located at 339 Mystic Street, Arlington, Massachusetts, more specifically described in the deed recorded on September 26, 2003, in the South Middlesex County registry of deeds, book 41030, page 479

(b) The real property located at 62 Cambridge Street, Winchester, Massachusetts, more specifically described in the deed recorded on July 13, 2001, in the South Middlesex County registry of deeds, book 33250, page 379

All in accordance with Title 18, United States Code, Section 1594(b) and Rule 32.2(a), Federal Rules of Criminal Procedure.

**SECOND FORFEITURE ALLEGATION: 18 U.S.C. 982(a)(6)-- Criminal Forfeiture**

The Grand Jury further alleges that:

As a result of committing one or more of the offenses alleged in Counts Nine and Ten of this Indictment, charging harboring an Alien in the United States, in violation of 8 U.S.C.

§1324(a)(1)(A)(iii) and (B)(i):

**HANA F. AL JADER**

defendant herein, upon conviction, shall forfeit to the United States, pursuant to 18 U.S.C. §982(a)(6)(A), any conveyance, including any vessel, vehicle, or aircraft used in the commission of the offense of which the person is convicted; and any property real or personal that constitutes, or is derived from or is traceable to the proceeds obtained directly or indirectly from the commission of the offense; or that is used to facilitate, or is intended to be used to facilitate the commission of the offense.

1. Such property includes, but is not limited to, the following:

(a) The real property located at 339 Mystic Street, Arlington, Massachusetts, more specifically described in the deed recorded on September 26, 2003, in the South Middlesex County registry of deeds, book 41030, page 479

(b) The real property located at 62 Cambridge Street, Winchester, Massachusetts, more specifically described in the deed recorded on July 13, 2001, in the South Middlesex County

registry of deeds, book 33250, page 379

2. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. §853(p), as incorporated by 18 U.S.C. §982(b), to seek forfeiture of any other property of the defendants up to the value of the above forfeitable property,

All in accordance with Title 18, United States Code, Section U.S.C. 982(a)(6) and Rule 32.2(a), Federal Rules of Criminal Procedure.

A TRUE BILL

*Jimmy Macnam*

FOREPERSON OF THE GRAND JURY

*B. J. Hunt*

ASSISTANT U.S. ATTORNEY

*David B.*

TRIAL ATTORNEY

DEPARTMENT OF JUSTICE

DISTRICT OF MASSACHUSETTS; March 29, 2005.

Returned into the District Court by the Grand Jurors and  
filed.

*Robert Russo*  
DEPUTY CLERK

*a) 12:20 P. M.  
3/29/05*

**Criminal Case Cover Sheet****05 CR 10085 RCL****U.S. District Court - District of Massachusetts**Place of Offense: Winchester Category No. II Investigating Agency FBI ICECity Winchester/Arlington Related Case Information:County Middlesex Superseding Ind./ Inf. Case No. \_\_\_\_\_  
Same Defendant \_\_\_\_\_ New Defendant x  
Magistrate Judge Case Number \_\_\_\_\_  
Search Warrant Case Number MJ 04-261,262-JLA  
R 20/R 40 from District of \_\_\_\_\_**Defendant Information:**Defendant Name HANA F. AL JADER Juvenile ☐ Yes ☒ No

Alias Name \_\_\_\_\_

Address 62 Cambridge Street Winchester, MABirth date (Year only): 1965 SSN (last 4 #): 4929 Sex F Race: W Nationality: SaudiDefense Counsel if known: Saher Joseph Macarius Address: 21 Walsh Street  
Framingham, MA 01701

Bar Number: \_\_\_\_\_

**U.S. Attorney Information:**AUSA S. THEODORE MERRITT Bar Number if applicable \_\_\_\_\_Interpreter: ☒ Yes ☐ No List language and/or dialect: ArabicMatter to be SEALED: ☒ Yes ☐ No☒ Warrant Requested ☐ Regular Process ☐ In Custody**Location Status:**

Arrest Date: \_\_\_\_\_

☐ Already in Federal Custody as \_\_\_\_\_ in \_\_\_\_\_☐ Already in State Custody \_\_\_\_\_ ☐ Serving Sentence ☐ Awaiting Trial☐ On Pretrial Release: Ordered by \_\_\_\_\_ on \_\_\_\_\_Charging Document: ☐ Complaint ☐ Information ☒ IndictmentTotal # of Counts: ☐ Petty \_\_\_\_\_ ☐ Misdemeanor \_\_\_\_\_ ☒ Felony 10

Continue on Page 2 for Entry of U.S.C. Citations

☒ I hereby certify that the case numbers of any prior proceedings before a Magistrate Judge are accurately set forth above.Date: 3/29/05 Signature of AUSA: [Signature]



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District Court Case Number (To be filled in by deputy clerk): \_\_\_\_\_

Name of Defendant Hana F. Al Jader

## U.S.C. Citations

	<u>Index Key/Code</u>	<u>Description of Offense Charged</u>	<u>Count Numbers</u>
Set 1	<u>18 U.S.C. 1589, 1594</u>	<u>Forced Labor and Attempted Forced Labor</u>	<u>1, 2</u>
Set 2	<u>18 U.S.C. 1592</u>	<u>Document Servitude</u>	<u>3, 4</u>
Set 3	<u>18 U.S.C. 1519</u>	<u>Falsification of Records</u>	<u>5, 6</u>
Set 4	<u>18 U.S.C. 1546, 2(b)</u>	<u>Visa Fraud and Aiding and Abetting</u>	<u>7, 8</u>
Set 5	<u>8 U.S.C. 1324(a)(1)(A)</u>	<u>Harboring an Alien in the United States</u>	<u>9, 10</u>
Set 6	_____	_____	_____
Set 7	_____	_____	_____
Set 8	_____	_____	_____
Set 9	_____	_____	_____
Set 10	_____	_____	_____
Set 11	_____	_____	_____
Set 12	_____	_____	_____
Set 13	_____	_____	_____
Set 14	_____	_____	_____
Set 15	_____	_____	_____

ADDITIONAL INFORMATION: